

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) No.
vs.)
)
DONYE PEACE, a/k/a "El Baggo,")
ANNEYUS D. JAMES,)
OTIS M. PATTERSON, and)
THEODORE BRADFORD,)
)
Defendants.)

FILED
OCT 19 2022
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST LOUIS

4:22CR580 MTS/NCC

INDICTMENT

COUNT ONE
(Distribution of Cocaine)

The Grand Jury charges that:

On or about August 19, 2022, in St. Louis County, in the Eastern District of Missouri,

DONYE PEACE, a/k/a "El Baggo,"

Defendant herein, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO
(Distribution of Cocaine)

The Grand Jury further charges that:

On or about August 26, 2022, in St. Louis County, in the Eastern District of Missouri,

DONYE PEACE, a/k/a "El Baggo," and
ANNEYUS D. JAMES,

Defendants herein, aiding and abetting each other, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled

substance.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT THREE
(Distribution of Cocaine)

The Grand Jury further charges that:

On or about September 7, 2022, in St. Louis County, in the Eastern District of Missouri,

**DONYE PEACE, a/k/a “El Baggo,” and
OTIS M. PATTERSON,**

Defendants herein, aiding and abetting each other, did knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR
(Possession of a Firearm in Furtherance of a Drug-Trafficking Crime)

The Grand Jury further charges that:

On or about September 7, 2022, in St. Louis County, in the Eastern District of Missouri,

DONYE PEACE, a/k/a “El Baggo,”

Defendant herein, knowingly possessed a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, distribution of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, as charged in Count Three.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIVE
(Possession of a Firearm in Furtherance of a Drug-Trafficking Crime)

The Grand Jury further charges that:

On or about September 7, 2022, in St. Louis County, in the Eastern District of Missouri,

OTIS M. PATTERSON,

Defendant herein, knowingly possessed a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, distribution of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, as charged in Count Three.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SIX
(Distribution of Cocaine)

The Grand Jury further charges that:

On or about September 15, 2022, in the City of St. Louis, in the Eastern District of Missouri,

DONYE PEACE, a/k/a “El Baggo,” and
THEODORE BRADFORD,

Defendants herein, aiding and abetting each other, did knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2

COUNT SEVEN

(Possession of a Firearm in Furtherance of a Drug-Trafficking Crime)

The Grand Jury further charges that:

On or about September 15, 2022, in the City of St. Louis, in the Eastern District of Missouri,

DONYE PEACE, a/k/a “El Baggo,”

Defendant herein, knowingly possessed a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, distribution of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, as charged in Count Six.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT EIGHT

(Possession of a Firearm in Furtherance of a Drug-Trafficking Crime)

The Grand Jury further charges that:

On or about September 15, 2022, in the City of St. Louis, in the Eastern District of Missouri,

THEODORE BRADFORD,

Defendant herein, knowingly possessed a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, distribution of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, as charged in Count Six.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT NINE
(Dealing Firearms Without a License)

The Grand Jury further charges that:

Beginning on or about August 29, 2022, and continuing until on or about September 15, 2022, in St. Louis County and the City of St. Louis, within the Eastern District of Missouri, and elsewhere,

**DONYE PEACE, a/k/a “El Baggo”,
OTIS M. PATTERSON, and
THEODORE BRADFORD**

Defendants herein, not being licensed dealers within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in Counts One, Two, Three, and Eight, Defendants shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations.

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States

Code, Section 924(c) as set forth in this Indictment, Defendants shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violations.

4. Subject to forfeiture is a sum of money equal to the total value or any property, real or personal, constituting or derived from any proceeds traceable to Defendants' offenses.

5. If any of the property described above, as a result of any act or omission of Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

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